

J. Ashlee Albies, OSB No. 051846
Email: ashlee@albiesstark.com
Maya Rinta, OSB No. 195058
Email: maya@albiesstark.com
Albies & Stark, LLC
1500 SW First Ave, Suite 1000
Portland, Oregon 97204
Telephone: (503) 308-4770

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

JEREMIAH COOK, an individual,

Plaintiff,

v.

TEQUILA THURMAN in her individual capacity,
CARRIE HUTCHISON in her individual
capacity, and **RYAN LUFKIN** in his individual
capacity;

Defendants.

Case No. 3:24-cv-01481-AB

**JOINT MOTION FOR EXTENSION OF
PRETRIAL DEADLINES**

On October 31, 2024 the parties conducted a Fed. R. Civ. P. Rule 26(f) and Local Rule 26-1 conference, and filed a joint FRCP 26(f) report along with a joint motion to extend pretrial deadlines, which this court adopted. ECF 19. On April 9, 2024, Defendant Thurman filed an unopposed motion to extend the pre-trial deadlines in this case, which this Court granted. ECF 26. The parties have continued to engage in discovery in this case and have scheduled depositions in this case in early June 2025 due to availability of the parties and counsel. The parties have discussed the current pre-trial deadlines and agree additional time is necessary. The parties request that the current deadlines be extended as follows:

PAGE - 1 JOINT MOTION FOR EXTENSION OF PRETRIAL DEADLINES

ALBIES & STARK

ATTORNEYS AT LAW

1500 SW FIRST AVE. #1000, PORTLAND, OR 97204
TEL 503.308.4770 | FAX 503.427.9292

	Current Deadline	Proposed Deadline
File all pleadings pursuant to Fed. R. Civ. P 7(a) and 15	June 2, 2025	July 17, 2025
Join all claims, remedies, and parties pursuant to Fed. R. Civ. P. 18 & 19	June 2, 2025	July 17, 2025
Complete all fact discovery	June 30, 2025	August 14, 2025
Joint ADR report	July 14, 2025	30 days after the Court's ruling on dispositive motions
File all dispositive motions	July 25, 2025	September 8, 2025
Oral Argument on Dispositive Motions	October 6, 2025	[At a date convenient for the Court, preferably on or after October 20, 2025]
Experts Disclosure/Reports	30 days after the Court's ruling on dispositive motions	30 days after the Court's ruling on dispositive motions
Expert Rebuttal Reports	14 days after Expert Reports	14 days after Expert Reports
Close of Expert Discovery	30 days after Expert Disclosure/Reports	30 days after Expert Disclosure/Reports
Pretrial Order	February 23, 2026	February 23, 2026
Pretrial Conference	March 23, 2026	[At a date convenient for the Court; the parties are available any day March 13-20, 2026]
Jury Trial	March 31, 2026	March 31, 2026

This motion is not made for purposes of delay.

Respectfully submitted this 23rd day of April, 2025.

s/ J. Ashlee Albies

J. Ashlee Albies, OSB No. 051846
Maya Rinta, OSB No. 195058
ashlee@albiesstark.com
maya@albiesstark.com

Attorneys for Plaintiff

s/ Andrea Coit

Andrea Coit, OSB No. 002640
Johnathan Hood, OSB No. 133872
acoit@eugenelaw.com
jhood@eugenelaw.com

Attorneys for Defendant Carrie Hutchinson

s/ Michelle Enfield

Michelle Enfield, OSB No. 152293
Michael Washington, OSB No. 873679
Michelle.enfield@doj.oregon.gov
Michael.r.washington@doj.oregon.gov

Attorneys for Defendant Ryan Lufkin

s/ Michael Porter

Michael Porter, OSB No. 211377

Mike.porter@portlandoregon.gov

Attorney for Defendant Tequila Thurman